

**MISSOURI ENVIRONMENTAL
MANAGEMENT PARTNERSHIP**

IMPLEMENTATION PLAN

NOVEMBER 1, 2002

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MISSOURI DEPARTMENT OF NATURAL RESOURCES

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EXECUTIVE SUMMARY

An environmental management system (EMS) is a voluntary, organized and coordinated process of planning activities, responsibilities and resources for developing, implementing, and maintaining an environmental policy. The Missouri Environmental Management Partnership (MEMP) is the program through which the Missouri Department of Natural Resources (department) encourages businesses, local governments, state agencies, educational institutions and other organizations to improve their environmental performance by developing and implementing an EMS.

The MEMP program was originally conceived by the department EMS Advisory Group, which convened and issued broad recommendations in late 1999 and early 2000 for the agency.

The agency has taken the Advisory Group's general plan (previously named the Missouri Partnership for Superior Environmental Performance) and developed this detailed implementation plan.

MEMP is the department program that encourages organizations to voluntarily develop and implement an EMS. MEMP has several levels of participation and each level has certain entry criteria, cooperative permitting possibilities and recognition benefits. Seeking entry is voluntary, but MEMP will uphold generally recognized EMS conformance criteria as benchmarks for success and participation in the program. The conformance criteria include regulatory compliance and broader environmental goals.

The plan features a step-by-step process on participation in the department program, including sections on initial entry, maintaining standing in the program and exiting the program. It also outlines cooperative permitting measures for organizations that are accepted into the program, and implementation processes for the department as it inaugurates this program over a period of time.

1 INTRODUCTION

The concept and merits of EMS have been under consideration within the business, governmental and organizational community for many years. An EMS is a voluntary, organized and coordinated process of planning activities, responsibilities, procedures, and resources for developing, implementing and maintaining an environmental policy within an organization. An EMS may be implemented throughout an organization, within certain operating units, or at certain geographic locations. This system provides a defined framework for planning and management of environmental aspects/impacts in our environment. It is a “bigger picture” view of the effects our organizations have on the environment, and its existence within an entity increases the chances of environmental awareness, improved processes, better communications and management improvements. These factors, aside from internal benefits to the organization, increase the awareness, communications and knowledge necessary to elevate the organization’s “environmental ethic” and to move beyond traditional notions of environmental compliance. Organizations that have been using EMSs for a number of years have reported significant benefits to themselves, their communities and our overall environment.

For these reasons, the department and many of other entities are recognizing that implementation of these systems is an effective way to expand and systematize environmental stewardship inside and outside an organization. EMSs are seen as the next step in the progression of organizational responsibility to our environment. It is believed that a properly implemented EMS will not only enhance ongoing obligations such as traditional legal compliance, but will expand knowledge and accountability within an organization to identify, correct and prevent root causes of future problems. These collective benefits of EMS accrue to the natural resources of the State of Missouri, to the businesses and institutions within the state, and to state and local government itself.

1.1 PROGRAM HISTORY AND FEATURES

In 1998, John Young, director of what was then the department’s Division of Environmental Quality (“DEQ”), established an internal working group to evaluate the role of DEQ relative to EMS. Shortly thereafter, the State of Missouri became a member of the Multi-State Work Group (“MSWG”) in order to follow the progress other states are making in encouraging EMS. In November 1998, the department held an EMS workshop for the purpose of hearing statewide

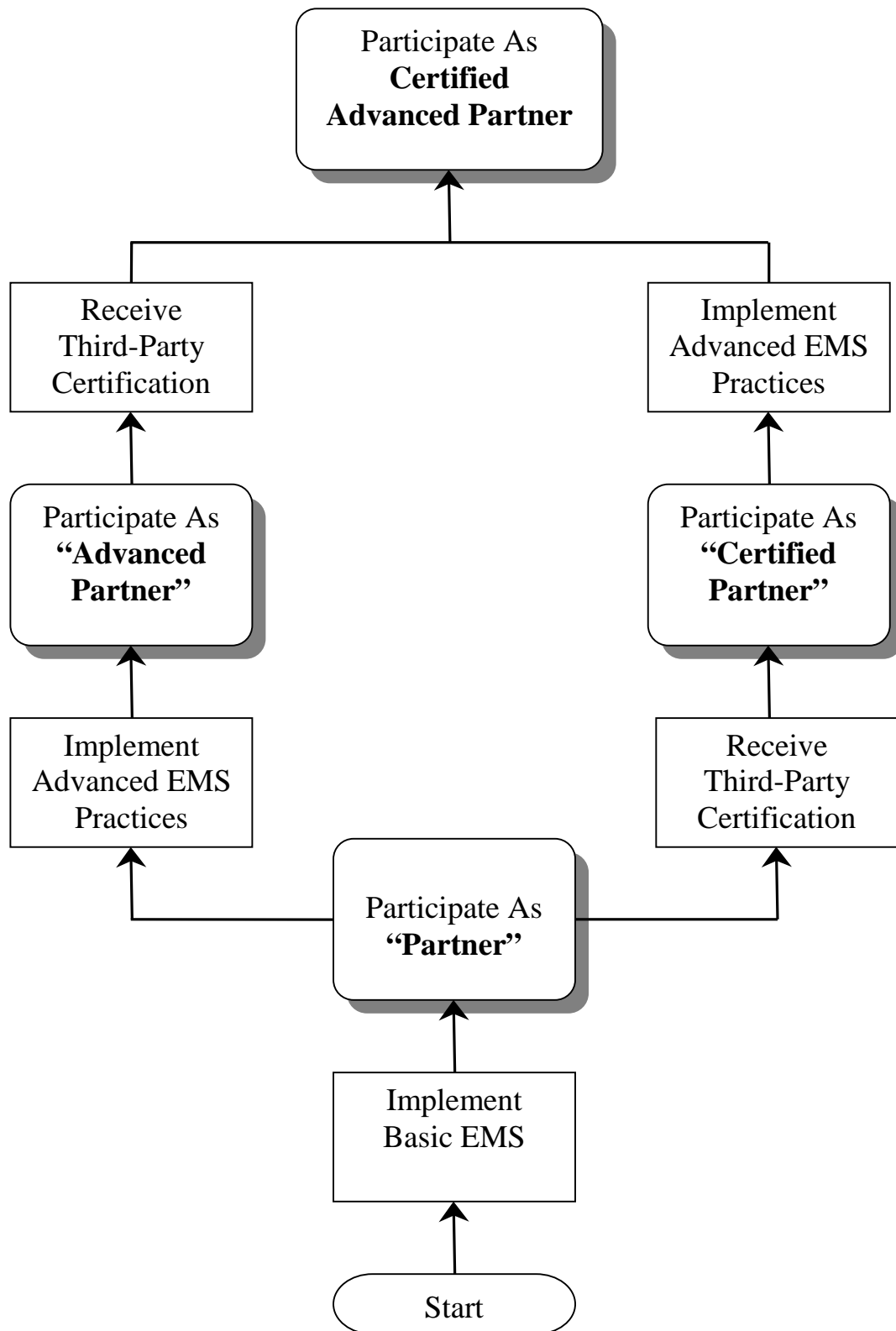
viewpoints on EMS to determine what role, if any, the department should take in encouraging them in Missouri. Based on the positive input from outside stakeholders, the department convened the multi-stakeholder EMS Advisory Group in September 1999. After a series of monthly meetings and sub-committee work through the middle of 2000, the Advisory Group released its report and recommendations in July of that year. That report, titled “The Missouri Partnership for Superior Environmental Performance”, outlined a multi-level program for the department that featured incentives, recognition and programmatic elements necessary to advance a state-wide effort from the department and various public/private partnerships. In 2001, the department Core Committee on Implementation took previous Advisory Group reservations on the name of the program and renamed it for simplicity. The Missouri Environmental Management Partnership, as it is now called, is the cornerstone of this implementation plan and features four classifications of EMS with corresponding requirements, cooperative programs, and recognition elements.

The four classifications of EMS within the MEMP may be implemented through two distinct pathways. The first three of the four classifications include a basic EMS, a third party certified EMS, and an advanced EMS that incorporates characteristics beyond both the basic EMS and current regulatory requirements. The fourth classification combines third-party certification and advanced characteristics. The distinct pathways provide participants one of two ways to implement features beyond the basic EMS. Participants may seek certification of their EMS to a third-party standard. The department recognizes that some participants may not desire such third-party certification, but may desire to implement more advanced EMS practices. A participant following either pathway may also choose to implement all components of the MEMP program through an EMS that includes advanced practices and is certified to a third-party standard. Therefore the MEMP provides four classifications for participation in this program: Partner, Certified Partner, Advanced Partner, and Certified Advanced Partner.

Figure 1-1 illustrates the pathways for implementation of the program components by an organization that has not developed an EMS. An organization with an EMS in place would enter MEMP at the appropriate partner classification.

The MEMP is designed to build upon the experience gained through the pilot programs conducted by the MSWG. Therefore, the department will not conduct a pilot program prior to full implementation of the MEMP. The MEMP is also designed to complement national EMS programs, such as the U.S. Environmental Protection Agency’s Performance Track.

Figure 1-1 MEMP Participation Structure



1.2 PROGRAM ELEMENTS

An organization that participates as a Partner in the MEMP must document conformance with the ten basic elements of an EMS and demonstrate consistent and ongoing implementation of the EMS as documented and accepted by the department. The EMS must be documented at the outset through the MEMP application to the department. The Partner criteria are based on self-verification, and the organization must provide annual documentation of conformance with all ten elements to the department. The department may perform “in facility” assessments to verify EMS implementation.

The ten basic elements of MEMP Environmental Management System are described in general terms in the following paragraphs. The MEMP Environmental Management System Standard and Review Guide (Appendix B) specifies the required characteristics of each element. While the elements are described individually, the EMS should tie the 10 elements together in a way that ensures that they function as a coordinated system, not a collection of separate and independent elements.

1. **Environmental Policy Statement**
The organization must have prepared a written statement of its policy regarding environmental issues, including impact on the environment, adherence to applicable regulations, and commitment to continual improvement of its environmental performance through the EMS.
2. **Environmental Impacts**
The organization must have evaluated the actual or potential impacts on the environment from current or near future activities and conditions and must have defined procedures to direct activities relative to environmental impacts.
3. **Legal and Other Requirements**
The organization must have identified the legal requirements for its operations, including relevant environmental laws and regulations, and have a process for tracking any changes in these requirements.
4. **Objectives and Targets**
The organization must have established positive objectives relevant to environmental issues, impacts and legal and other requirements. The organization also must have established targets necessary for achieving the stated objectives. A documented procedure for review and update of objectives and targets, as well as for establishing new objectives and targets, must be in place.
5. **Roles and Responsibilities**
The organization must have defined employee roles primarily responsible for implementation of the EMS and must have defined the responsibilities,

accountabilities and authorities of each role in the organization that has involvement in the EMS.

6. **Record Keeping and Reporting**
The organization must have documented processes for the collection and documentation of information about its operating procedures related to the implementation of the EMS.
7. **Training**
The organization must have a process for ensuring that employees are familiar with the requirements of the EMS and have the training necessary to execute their roles and responsibilities.
8. **Emergency Response**
The organization must have documented procedures for responding to, mitigating and reviewing incidents or environmental emergencies.
9. **Assessment**
The organization must have documented procedures and a schedule for assessments of the function and effectiveness of and conformance with the EMS, including applicable legal requirements.
10. **Corrective Action**
The organization must have documented processes for review of and reaction to assessment information, investigation of any identified nonconformance with the EMS, and action to correct or address the nonconformance.

In order for an organization to qualify as a Certified Partner in the MEMP, all requirements of the Partner classification must be met. In addition, a Certified Partner must be certified to ISO 14001 or another credible EMS standard that includes third-party certification. The department will review and verify the certification.

To be an Advanced Partner in the MEMP, an organization must meet the requirements for Partner. In addition, the organization must satisfy the following:

- The organization must have defined objectives that specify environmental standards more protective than those required by applicable legal requirements (that is, beyond compliance).
- As a part of its commitment to and demonstration of continual improvement of its EMS and its environmental performance, the organization must advance along the waste management hierarchy (reduce, reuse, recycle, effectively treat, safely dispose) with an end result of pollution prevention (source reduction).

- The organization must, on an annual basis, provide a written report of performance assessment results to the department.
- The organization must regularly communicate with and seek feedback from the local community and other stakeholders on performance assessment results and the status of the EMS implementation.

A Certified Advanced Partner in the MEMP fulfills all of the requirements of the other three classifications. That is, the organization's EMS conforms to the ten basic MEMP criteria and is certified by an approved third party. In addition, the EMS includes the program elements required for an Advanced Partner.

2 PROGRAM POLICY

The policy of the Missouri Department of Natural Resources, with respect to the Missouri Environmental Management Partnership program is as follows:

It is the policy of the Department of Natural Resources to promote pollution prevention and continual environmental improvement by encouraging organizations to develop and implement Environmental Management Systems.

By promoting pollution prevention and continual improvement, broad implementation of EMS programs throughout Missouri holds the potential for a higher quality environment than that achievable with only the current command and control regulatory mechanisms alone. This improved performance will result in a higher degree of resource stewardship, management and use that are sustainable in the long term.

Organizations that develop and implement EMS commit to the monitoring and the continual improvement of their environmental performance. Implementation of EMS programs helps organizations by improving cost control, improving public and community relations, meeting vendor certification requirements, reducing environmental liability and improving industry-government relations.

3 PARTICIPATION PROCESS

3.1 PARTICIPATION REQUIREMENTS

The department invites organizations including industries, businesses, local governments, educational institutions and others to participate in the MEMP program. Participation is achieved through application by organizations meeting certain criteria. Substantive requirements necessary for participation in the MEMP are as follows:

1. The applicant must have implemented an EMS that includes all of the ten basic MEMP EMS elements.
2. If the applicant chooses to participate under a classification other than Partner, then implementation of the other requirements must also be documented.
3. The applicant must commit in writing to resolve all issues associated with documented noncompliance in accordance with a schedule of correction accepted by the department. This includes noncompliance with statutes, ordinances, rules and permits administered by federal, state and local environmental control agencies. Noncompliance resolution may include enforceable orders or agreements with schedules for compliance. This provision does not preclude participation by applicants that have experienced compliance problems in the past, but are seeking through an EMS to improve their compliance status and overall environmental stewardship. The department may defer the acceptance of an organization into MEMP pending resolution of compliance issues or until demonstration of consistent, improved performance following such resolution.

To seek participation in the MEMP, applicants should:

- a. Review the MEMP Application Guidance and the Review Guide.
- b. Complete a MEMP Application and submit all applicable information to the department.

3.2 ACCEPTANCE

The department, upon receipt of the application, shall determine if the applicant has been successful in demonstrating conformance with the particular EMS applied for in MEMP. This will be accomplished through review of application materials and an on-site interview or telephone conference with representatives of the applicant. Materials demonstrating conformance should have been developed within three months of the date of application. The gatekeeper¹ assigned to the applicant will lead these review activities. The activities will involve review of program eligibility, requirements and expectations of all parties with respect to cooperative permitting opportunities, records and other relevant issues. Cooperative permitting requests and the possibility of “custom-made” permit measures will be discussed at this stage. An EMS team comprised of staff of regulatory offices, led by the gatekeeper, may represent the department in this activity. Both parties should strive to expedite the EMS review process.

The department intends to consider all applicants on an equal basis. However, the department reserves the right to limit, at any time, the number of participants accepted into the MEMP program due to available resources or other limiting factors. During the first year of the program in particular, the department anticipates that the number of applicants accepted will need to be limited in order to assure the quality of activities conducted during this critical period.

3.2.1 Application Process Steps

The following steps should be followed to make application to participate in the MEMP program.

1. An organization should request copies of the MEMP application guidance and the standard and review guide (Appendices A and B) and any other MEMP guidance material via telephone, fax, e-mail or traditional letter. The application and guidance materials will be available on the department’s web site.
2. The application and supporting documentation should be submitted to the department’s Environmental Assistance Office. In the application, the applicant will indicate which of the four MEMP classifications of participation is being sought.

¹ An important means of fostering cooperation will be the assignment of an EMS Gatekeeper to each MEMP participant. The EMS Gatekeeper is discussed further in Section 4.2.6.1.

3. The gatekeeper assigned to the applicant will review the application and supporting documents for completeness. If the application is complete, the gatekeeper will send the applicant a letter acknowledging the completeness review and stating the anticipated review schedule. If the application is not complete, the gatekeeper will send the applicant a letter describing the deficiencies in the application package.
4. The complete application and the accompanying materials will be reviewed in detail in a process led by the gatekeeper and involving other department staff. The gatekeeper will communicate questions or concerns about the application to the applicant.
5. When the detailed review is nearing completion, the gatekeeper will schedule an interview meeting or conference telephone call with the applicant to review MEMP requirements and the application materials submitted, and to discuss cooperative permitting requests. The review team members may participate in this meeting or call.
6. Once the detailed review and applicant interview have been completed, the gatekeeper will forward appropriate materials to the MEMP steering committee with a recommendation for acceptance or denial into the program. In certain cases, the gatekeeper may request such a determination by the steering committee prior to completion of the detailed review and the applicant interview.
7. Upon receipt of appropriate information, the MEMP steering committee will convene to evaluate and accept or deny the application or request additional information or EMS changes. If the determination is made to accept the application, the steering committee will consider appropriate recognition, permitting and enforcement mitigation incentives. The steering committee will authorize the gatekeeper to forward the MEMP recommendation to the directors of the Air and Land Protection Division (ALPD) and the Water Protection and Soil Conservation Division (WPSCD) for review and concurrence with proceeding with public review of the application. MEMP recommendations that involve Geological Survey and Resource Assessment Division (GSRAD) permits and rules will also be forwarded to the GSRAD director.
8. With the concurrence of the of division directors, MEMP application summaries and recommendations will be presented to any relevant regulatory policy commissions and to external advisors who will be requested to consider and react to department recommendations to accept an applicant into the MEMP. The steering committee will

receive and act upon comments from the commissions and external advisors, including seeking EMS revisions from the applicant. A final steering committee recommendation will then be made to the division directors.

9. ALPD, WPSCD and, if appropriate, GSRAD directors will review the steering committee recommendation and either return the recommendation to the Steering Committee with comments or forward the application recommendation to the department director for final approval.
10. Upon final determination of the application, the applicant will be informed in writing of the results of the review and the determination of acceptance or denial in a letter from the department director.

3.3 MAINTENANCE AND CONTINUED PARTICIPATION

The MEMP program contemplates that the successful applicant (member) will be able to maintain and continue participation in the program over the long term. To assist the department in tracking member activities and progress, the member organization annually will submit relevant self-assessment reports, audits or other systems documentation necessary to demonstrate EMS conformance, including an ongoing commitment to continual improvement.

3.3.1 Self-Assessment and Reporting

The department will request that the member organization send in relevant self-assessment materials such as an EMS annual audit report at least every twelve (12) months. The submittal of these materials will be according to a schedule mutually agreed to by the member and the gatekeeper.

The self-assessment report shall demonstrate conformance with the ten elements of the Partner EMS, and any additional information needed for assessment of other MEMP EMS member classifications. The report shall be based on self-verification principles, which means that audit by a third party, or submission of complete third-party audit reports if available, is not required for MEMP participation. Appendix D presents Annual Reporting Guidance.

3.3.2 Quality Assurance and EMS Evaluation

The department may conduct on-site evaluations of an EMS on a case-by-case basis. The EMS evaluation will be performed by the department's on-site assessment team, possibly with support from ALPD and WPSCD programs and regional offices around the state. The evaluation will be of the EMS itself, and how the system is functioning. The level of scrutiny and the frequency of EMS evaluation may be related to the amount of detail and completeness of the annual report to the department, as well as other factors such as compliance history, proximity to sensitive areas or populations, etc. Appendix B is the EMS Standard and Review Guide that departmental staff will employ during assessments and other reviews.

3.3.3 Continual Improvement

A fundamental principle of the MEMP is the commitment by a member to continual improvement of the EMS and their environmental performance. All components of an EMS do not have to continually improve simultaneously, but long-term overall improvement is a basic tenet of the program and will be encouraged throughout the partnership.

3.3.4 Level of Participation

The applicant indicates which of the four classifications (Partner, Certified Partner, Advanced Partner and Certified Advanced Partner) is being sought at the time of initial application to MEMP. After acceptance into MEMP, a member may request that the classification be changed to either a more or less complex EMS. Such a request would need to be supported by appropriate information and, when accepted by the MEMP steering committee, would result in a modification of the incentives associated with EMS.

3.4 EXITING THE PROGRAM

The MEMP is a voluntary activity. Organizations choose to develop an EMS and, subsequently, decide to submit it to the department to support an application to join MEMP. If admitted to MEMP, the department provides a series of incentives in recognition of the commitment and effort involved in developing and maintaining an EMS. To remain in good standing in the MEMP, and to continue to benefit from the associated incentives, an organization must adhere to and fulfill its EMS provisions and commitments.

Organizations may choose to end their involvement in MEMP. Other organizations may be removed from the program because of nonconformance with their EMS. The procedures that will be followed by the department with respect to requests to withdraw from the MEMP and the potential need to terminate an organization's involvement in the program are presented in the sections that follow.

3.4.1 Voluntary Withdrawal

An organization in one of the partnership categories of the MEMP may withdraw from the program at any time. The request to withdraw should be in the form of a letter sent to the department director. The letter should be signed by an organization manager at or above the management level that was responsible for submitting the application for the MEMP.

The department will promptly acknowledge receipt of the request to withdraw. Additionally, within 30 days of receipt, the department will specify the process and the time schedule that will be followed to end the program incentives that may be in effect. Such a process may involve modification of issued permits according to established and applicable regulatory requirements. As an alternative, for facilities with EMS related permit modifications, the department may issue the permit with both the EMS related provisions and standard permit provisions and conditions. Then, if the facility withdraws from MEMP, the standard permit provisions would be immediately in effect. The department will maintain a publicly available listing of organizations that are accepted into MEMP. When the action to withdraw is final, the department will remove the organization from the membership list and may for a period of time list the organization as having withdrawn voluntarily from the MEMP.

3.4.2 Nonconformance with the EMS

Knowledge of nonconformance with the commitments and provisions of an organization's EMS will result in action by the department. At a minimum, the department will require the submission of a written explanation of the situation and factors related to the nonconformance. Additionally, the department may require the submission of a written outline of the corrective and preventive actions that will be followed to resolve the nonconformance and avoid a future repetition. The department may request that the corrective and preventive actions be based on a thorough analysis of the cause of the nonconformance (e.g. a root cause analysis).

Nonconformance with the commitments and provisions of the EMS also may result in the department suspending some or all of the MEMP incentives until the preventive and corrective actions have been accomplished. Such an action by the department will be communicated in writing to the organization's EMS representative, as will the following acceptance of the resolving actions and the reinstatement of the program incentives.

Nonconformance with the commitments and provisions of the EMS also may result in the department acting to terminate the organization's involvement in the MEMP.

3.4.3 Termination by the Department

If the department determines that nonconformance with the commitments and provisions of the organization's EMS represents a serious breakdown of the continuing implementation of the system, it will terminate an organization's membership in the MEMP. Examples of a serious breakdown of EMS implementation include, but are not limited to, situations such as the following:

- Failure to implement one or more of the 10 basic elements of the MEMP EMS;
- A pattern of nonconformance with MEMP EMS provisions and commitments; and
- Serious noncompliance with applicable regulatory requirements.

Termination of membership will result in cancellation or cessation of all program incentives. The department will provide the organization with written notice of termination of its membership in the MEMP. The notice will be directed to the organization's EMS representative and the office of the person who signed the MEMP application. The organization will have 30 calendar days from the date of the department's notice to demonstrate why the termination should be rescinded.

In the notice to terminate membership, the department will specify the process and the time schedule that will be followed to end the program incentives that may be in effect. Such a process may involve modification of issued permits according to established and applicable regulatory requirements. As an alternative, for facilities with EMS related permit modifications, the department may issue the permit with both the EMS related provisions and standard permit

provisions and conditions. Then, if the facility membership in MEMP is terminated, the standard permit provisions would be immediately in effect. The department will maintain a publicly available listing of organizations that are accepted into MEMP. Therefore, the department will remove the organization from the membership list upon termination action. Additionally, the department may list or otherwise publicize the termination from the program.

4 RECOGNITION AND COOPERATIVE PROGRAMS

Through the MEMP, the department will work with program participants to capitalize on the awareness, communication and stewardship provided by EMS and will cooperate with participants to achieve overall improved environmental quality and greater efficiency. Through these cooperative efforts, the department and participants will be able to increase the effectiveness of permit-related activities and seek to reduce the workload associated with these permits for both the department and the participants. An important means of fostering cooperation will be the assignment of an EMS gatekeeper to each MEMP participant. The EMS gatekeeper is discussed further in Section 4.2.6.1. In recognition of the benefits that will accrue to the department, the citizens and the environment of the State of Missouri, the department will recognize participants in this program. Through these cooperative programs and recognition, the department will seek to encourage greater voluntary development of responsible environmental management systems throughout the State of Missouri.

4.1 RECOGNITION INCENTIVES

The MEMP program will feature a wide array of opportunities for recognition by the department and its public and private partners. The department will focus on efforts that give the proper recognition to members who have exhibited the commitment, resources, and vision it takes to successfully implement and maintain an EMS.

The department is considering a number of measures to recognize participants in this program. The primary list of measures considered includes the following.

1. Wall plaque for members of all classifications.
2. Feature articles in the Preserving Missouri's Natural Resources Newsletter.
3. Listing EMS members on the department web page.
4. Inclusion of members in a department-produced EMS brochure distributed at department events and public outreach activities.

5. Listing as an MEMP member in Missouri Resources Magazine.
6. Development of the MEMP logo and allowing its use for member advertising and placement on merchandise, such as T-shirts, mugs, etc.
7. Letters or news releases to local media with current MEMP member listings and information.
8. Letters to trade or municipal organizations with current MEMP member listings and information.
9. Highlighting MEMP and its members in the department annual reports and other routine or special external reports.
10. Provision of official department MEMP signs or sign attachments at a nominal cost.
11. Department management acknowledgement of MEMP members in presentations outside the agency.
12. Placement of MEMP membership lists in public buildings and places, which would include selected department buildings and other public venues where others would allow display.

Other strategies for recognition will be explored and refined during the maturation of the program, which may include a possible EMS conference featuring members, a significant EMS ceremony for outstanding members, and other new ideas as they are suggested.

4.2 PERMITTING INCENTIVES

Through implementation of an EMS, participants in the program exhibit an increased level of environmental stewardship. Participants will have improved understanding of the aspects of their operations that interact with the environment, and will collect and communicate information regarding these interactions in a systematic manner. Through this EMS, program participants will be better able to manage their environmental interactions which will result in greater pollution prevention and improved environmental protection.

Because of this greater awareness and systematic management of environmental impacts, and expected enhancement of compliance-related issues, the participant and the department will benefit from cooperation to take advantage of the systems provided by the EMS to more effectively manage permitted activities. The participant is encouraged to discuss with the department elements of their EMS that will provide equivalent or improved management of permitted activities. Through these systems, the department may remove or reduce certain administrative requirements associated with present program procedures, policies and guidelines that are fully satisfied through the EMS. The department will work cooperatively with the applicant, will offer assistance and will consider alternative permitting approaches within statutory and regulatory authority.

4.2.1 Administrative Considerations

The development of an EMS requires a thorough investigation of all components of a business that affects that business's impact on the environment. Therefore, an EMS can be just as effective as a permit, if not more effective, in ensuring environmental protection. The development of a permit requires much of the same analysis in that it requires the review of processes that produce or result in some emission or discharge of contaminants and requires the development of process controls that limit the emission or discharge of the contaminants to the environment. Because both efforts impose similar operational controls, a facility's EMS and its environmental permit should be in concert with each other. Also, many of the elements of an EMS may be viewed as satisfying the requirements of a permit, thereby allowing the permit to be possibly streamlined or abbreviated in certain aspects.

The department's ability to be responsive to member requests on permitting changes or related considerations is dependent upon whatever flexibility is available within the permitting system. This can include considerations that range from statutory or regulatory requirements that must be met to the availability of trained staff to service members' permits. Any changes to permits would be made at the earliest convenience.

4.2.2 Partner Level Considerations

Through the MEMP, the department will make available certain pre-defined cooperative permitting measures to each participant. Among these measures are:

- Expedited reviews of permit applications.
- Flexibility in permitting new pollution control technologies.
- Reduction or elimination of permit requirements duplicated by the EMS.
- Streamlined Reporting

4.2.2.1 Expedited Review of Permit Applications

Most department permitting programs have a schedule by which they normally perform permit reviews. Finite staffing and current procedures usually establish the minimum time limits. Therefore, to offer expedited reviews, new resources and alternative review methods shall be identified and implemented where practicable.

Additional resources for performing reviews may include “outsourcing” to a consultant. Applications for routine permit actions could be routed immediately to a consultant for review. Or, if the requested permit action requires the review of experienced staff, the consultant could perform reviews of other routine permits so that the department staff could devote their time to the review associated with the EMS facility.

4.2.2.2 Flexibility in Permitting New Pollution Control Technologies

The department may encourage new technologies for environmental controls, especially when these controls are proposed under programs that are managed through an EMS process. As a way of encouraging the use of new technologies, the department may provide flexibility in how permits are written so that they can be promptly implemented, fully explored and thoroughly evaluated for success. Permits that pose strict limits on new technologies often dissuade businesses from taking the risk of installing promising systems or from completing a sufficient test period.

Under an EMS, the business would perform a strict and regular evaluation of the new system such that any failure of the system to achieve expected levels would be quickly recognized and addressed. Environmental impact would be prevented or minimized by the response system specified in the EMS.

4.2.2.3 Reduction or Elimination of Permit Requirements Duplicated by the EMS

Provisions in permits that are duplicated in an EMS may be removed from the permit if EMS provisions meet stated criteria; that is, they are allowed by state statute and rule, are just as or more effective at protecting the environment, and are measurable in terms of their success. Examples of a permit requirement that could be relaxed are: 1) reduce the number of sample points or the monitoring and reporting frequencies to the minimum number required by law or rule, or 2) removal of reporting requirements that are satisfied by the self-evaluations required by the EMS.

The particular permit provisions that the organization wishes to target for removal should be identified by the applicant during the review of their MEMP application. Allowing the applicants to identify the cooperative permit measures that are important to them ensures that the MEMP incentives are truly meaningful.

4.2.2.4 Streamlined Reporting

The department will analyze the extent to which environmental reporting can be streamlined with successful members. It is expected that streamlining and further efficiencies will be possible as the EMS compliance goals and performance expectations of both the agency and the members become ever more closely related.

Possible streamlining options include:

- Electronic reporting;
- Pairing or coordinating reporting schedules such that multiple reporting requirements can be satisfied through consolidated mechanisms, and
- Eliminating submission of separate and distinct reports to each of multiple department programs if the reporting requirements are essentially the same.

4.2.3 Certified Partner and Advanced Partner Level Considerations

Participants in these categories have available the same measures described under 4.2.2 Partner Level Considerations. The department also will consider the additional outcomes

associated with participation in these categories in evaluation of other cooperative measures described below in Section 4.2.5.

4.2.4 Certified Advanced Partner Level Considerations

Participants in this category have available the same measures described under 4.2.2 Partner Level Considerations. Due to the significant commitment reflected in participation in this category, the department will consider additional cooperative permit measures and other appropriate incentives. The department also will consider the additional outcomes associated with participation in this category in evaluation of other cooperative measures described below in Section 4.2.5.

4.2.5 Cooperative Permit Considerations

The department recognizes that due to the diversity of potential members in the MEMP program, greater benefit to the department, the participants and the State of Missouri will be realized by consideration of the particular characteristics and interests of each Certified Partner, Advanced Partner and Certified Advanced Partner. Therefore, during the application process and throughout their participation in the MEMP, the department will discuss with these members and will consider alternative cooperative permit measures that may be appropriate. Such measures may be suggested by the department or by the member.

The department will evaluate such alternative cooperative permit measures to determine feasibility, benefits and appropriateness. The department will consider a number of aspects in these evaluations including:

- Potential impact of the measure on the environment,
- Protection of human health and safety,
- Feasibility within current regulations,
- Ability of the department to accommodate the measure (staff, structure, technology, etc.), and

- Effectiveness and consistency of management control, response and stewardship demonstrated by the member's EMS.

The department expects that certain cooperative measures may not be feasible or appropriate at the outset of this program or at the time of application. However, as this program continually improves and experience with the MEMP program and demonstration of its benefits increase, additional cooperative permitting measures may become available. Some of these measures may be directly related to changes in federal and state regulations and program guidance, which changes could be a result of U.S. EPA experience with Performance Track or department experience with MEMP.

4.2.6 Implementation

In order to ensure that the department can offer assistance to EMS applicants on program participation and permitting matters, the department will designate persons to facilitate program participation, application review and permit requests. The facilitation will be structured so that:

- The member has one point of contact (a gatekeeper) for all questions regarding program participation and how the EMS will affect the permitting processes across all program lines.
- The member has access to a team of permitting experts that are assigned to promptly review and respond to the issues pertaining to MEMP permit incentive requests. The gatekeeper or a member of the permitting team may respond to requests, but the gatekeeper will be the main source of contact and kept abreast of all EMS or permit issues related to the member.

4.2.6.1 EMS “Gatekeeper”

The single point of contact (gatekeeper) will be a staff member within the Outreach and Assistance Center, Environmental Assistance Office. The initial responsibility of that person will be to perform an application completeness review and, subsequently, coordinate a thorough content review of EMS applications and supporting materials to determine if the applicant is qualified for the MEMP program.

If a qualified applicant requests cooperative permitting measures, that request is directed from the gatekeeper to the permit incentive team. The gatekeeper is to track the progress of the permit incentive team in reviewing the application and to communicate the team's findings and recommendations to the applicant.

The gatekeeper is responsible for internal communications within the department related to the EMS and its review and approval by the MEMP steering committee and division and department management. The gatekeeper is the primary point of contact for the applicant or partner for communications with the department related to the EMS.

4.2.6.2 *Permit Incentive Team*

The permit incentive team will consist of knowledgeable individuals from each of the divisions and programs administering environmental permits. The team can be expanded to include staff of the Geological Survey and Resource Assessment Division (GSRAD) if a permit of that division is involved. These individuals would be assigned to review the requests for permit actions relevant to the removal of administrative hurdles and the implementation of cooperative permitting measures associated with their program's requirements and procedures.

The permit incentive team will focus on allowing permitting flexibility for facilities that agree to implement an EMS. Such flexibility would be in the context of Sections 4.2.1 through 4.2.5. The level of flexibility should consider:

- The discretion allowed by statutes and rules.
- The extent to which it is believed that the EMS can provide the protections otherwise provided by the permitting process or by the permit terms and conditions.
- The ability of the department to measure the effectiveness of the EMS in protecting the quality of the environment.

The burden should be on the applicant to earn the confidence of the department that the EMS will provide an equal or greater level of environmental protection than the "duplicative" terms of a permit. For example, an EMS may state that the organization will implement best

management practices to control or prevent pollution. It may also specify in detail what those practices involve and how the effectiveness of those practices will be measured. If these commitments are certain to result in a reduction in environmental impact, a relaxation in permit controls may be appropriate if the environmental laws and rules allow such relaxation. Such changes in permit controls may require acceptance by the regulatory program and policy commission on a case-by-case basis.

4.3 MITIGATION FOR SELF-REPORTED VIOLATIONS

An important component of an effective EMS is the discovery, correction and prevention of systemic problems that either cause or contribute to adverse or significant environmental impacts. Occasions will arise when organizations will discover non-compliance under state and federal environmental laws.

The department encourages self-policing and self-reporting in general and for a member of the MEMP program. In concert with this goal, the department utilizes a tool called Conference, Conciliation and Persuasion (CC&P) to help each member (or any entity subject to environmental laws and regulations) reach compliance requirements through a consensus and agreement structure.

The following policy statement and expectations applicable to CC&P are excerpted from the Division of Environmental Quality Conference, Conciliation and Persuasion Policy Statements and Expectations signed and dated by DEQ Director John Young on August 30, 1999:

It is the policy of the Division of Environmental Quality (DEQ) to employ Conference, Conciliation and Persuasion (CC&P) upon any finding and written notification of non-compliance with statutes, rules, permits or other enforceable actions in our jurisdiction. Exceptions to the use of CC&P may occur if the violations 1) represent an imminent and serious threat to human health and environmental quality, 2) appear to be intentional or result from negligence, or 3) have a required response specified in rule or guidance. CC&P shall have, as the minimum, the same meaning as portrayed in our various environmental statutes.

It is the expectation of the Division that CC&P will be an effective tool and will be used to an extent that realizes significant compliance gains without the burden of further enforcement.

The Division expects that those providing CC&P be diplomatic, courteous, respectful, willing to consider options, and convincing about the need to return the facility or site to compliance. CC&P, by design, should be a cordial exercise that will fail only because of the violator's inability or unwillingness to comply.

The complete CC&P policy is contained in the Appendix C, and is incorporated by reference and emphasized to the MEMP program and EMS members.

5 IMPLEMENTATION PROCESS

5.1 INTERNAL ORGANIZATION AND RESPONSIBILITIES

This program will involve department personnel from the director's office, the Outreach and Assistance Center, both the Water Protection and Soil Conservation and the Air and Land Protection divisions, and, when appropriate the Geological Survey and Resource Assessment Division. The following sections summarize the relationships and responsibilities of these personnel.

5.1.1 Department Director

The department director will provide direction and support for the MEMP program. The director or designated deputy director will meet regularly with the MEMP steering committee to review program information, determine goals and direct the continual improvement of the MEMP program. The director will review final recommendations and make final decisions related to an organization's membership in MEMP. The director and deputy directors will also be involved in the recognition of MEMP members.

5.1.2 Division Directors

The directors of the Water Protection and Soil Conservation Division, the Air and Land Protection Division and the Geological Survey and Resource Assessment Division, if a permit of that division is involved, will review the MEMP membership recommendations. These directors and the director of the Outreach and Assistance Center will participate with the department director in review and guiding the program, recognition activities and coordination of staff assigned to the implementation of the MEMP program.

5.1.3 Regulatory Policy Commissions and External Advisors

At the time a membership recommendation is forwarded from the MEMP steering committee to the division directors, the membership recommendation will be presented to involved regulatory policy commissions and external advisors. The commissions and external advisors will review and react to the appropriateness of a membership recommendation and the proposed

incentives. Department management will review the reactions of the commissions and the external advisors.

There are 10 policy commissions, boards or committees that related to ALPD, WPSCD, GSRAD and OAC programs that could receive information about MEMP applicants and membership recommendations. It is not anticipated that all of the commissions will be involved in each membership recommendation. The external advisors will be identified early in the MEMP program initiation period. They will be individuals not involved in MEMP program administration and who do not represent MEMP applicants or members. It is anticipated that the external advisors will be asked to review and react to all of the MEMP membership recommendations. The department is considering the involvement of these advisors through an Internet list-serve process. External advisor comments and recommendations will be forwarded to the division and department directors by the MEMP steering committee.

5.1.4 MEMP Steering Committee

The MEMP steering committee will be composed of department staff from within the environmental quality regulatory programs (preferably from the permits or enforcement sections), the OAC and other staff as appropriate from regional offices or the GSRAD. The department director, the ALPD and WPSCD directors, and the director of the OAC and, if appropriate, GSRAD, will select the members of the MEMP steering committee. To assure continuity and facilitate the start-up of the MEMP program, it is recommended that the staff who have served on the internal EMS committee transition into the first MEMP steering committee, but not to the exclusion of other staff who may be appointed to the committee by division directors. The steering committee will be responsible for overseeing implementation of the MEMP program, including the directions, goals and improvements specified by the department director and the division directors.

The steering committee will collect and evaluate program data, will review MEMP applications and will make recommendations to the division directors and to the department director. The steering committee will meet regularly with the department director or deputy directors and the division directors to evaluate the program data and discuss program goals and continual improvement.

5.1.5 Permit Incentive Team

The permit incentive team will be comprised of key individuals within the various permit programs of ALPD and WPSCD. The team can be expanded to include GSRAD staff when appropriate. This team will work with the gatekeepers and the MEMP members to evaluate and implement appropriate cooperative permit issues. The team will also confer with the gatekeepers and the MEMP steering committee on general cooperative permit considerations with regard to the MEMP program, including recommendations for continual improvement of the program.

5.1.6 EMS Gatekeepers

The EMS gatekeepers will be members of the Environmental Assistance Office who have been specifically selected and trained to interface between the department and MEMP applicants and members. The gatekeeper will be the primary point of contact for the applicant/member on all matters related to the MEMP program, including permit-related issues.

The gatekeepers will receive applications and related materials from applicants, perform an initial review of this information, communicate with the applicant, and coordinate full review of the application materials and interview of the applicant. The gatekeepers will make recommendations to the MEMP steering committee regarding acceptance or denial of applications for participation.

The gatekeepers will provide an ongoing single point of contact for departmental matters for MEMP members. They will be responsible for ongoing evaluation of members, communication with members and relevant department staff, and will coordinate quality assurance and EMS evaluation activities.

The gatekeepers will collect and evaluate information regarding the program and will communicate observations from this data to the MEMP steering committee. The gatekeepers will communicate and meet regularly with the MEMP steering committee to discuss program performance, including applications, permitting issues, recognition and other cooperative programs, opportunities for program improvements and other issues of significance to the ongoing successful operation of the program.

5.2 TRAINING

A variety of training will be necessary to support the implementation of the MEMP. A listing of the various types of training anticipated is provided in Appendix F. Training is identified for organizations interested in or implementing an EMS, assistance providers working with those organizations and department staff. When used in the training descriptions, the term “assistance providers” may include consultants, associations, colleges, universities, University Extension and Outreach, Small Business Development Centers, Department of Economic Development, non-governmental organizations (NGO), chambers of commerce and similar organizations.

5.3 INTERNAL AND EXTERNAL PROMOTION

Effective implementation and maximizing the benefit of the MEMP program will require promotion, both within the department and to potential participants and stakeholders. A discussion of various mechanisms for promotion of this program is provided in Appendix E.

5.4 INTERNAL REPORTING AND RECORD KEEPING

In order to efficiently operate this program and to be effective in achieving the benefits anticipated through this program, it will be necessary to collect and maintain certain data and to communicate that data within the department. This information will be especially important in the evaluation of program acceptance and support, program success, and opportunities for continual improvement. The information collected and the methods of record keeping, evaluation, and communication should be considered on an ongoing basis by the MEMP steering committee and should be a specific issue discussed during program reviews by the steering committee and the department director, deputy directors and the division directors.

Following is a list of types of information that should be collected, evaluated, and communicated from the outset of the program. MEMP management and staff are encouraged to consider other or alternative data that may be collected, evaluated, and communicated in order to continually improve the MEMP program and the positive benefits of EMS implementation accrued to the department, members, and the State of Missouri.

- The number of applicants, divided by classification (industry, municipality, educational institution, etc.) and category of participation.

- The number of members, divided in the same manner as applicants and their record of participation (i.e. length of participation, advancement within the program, degree of continual improvement, etc.).
- Applicant and member compliance and enforcement statistics (prior to and after participation)
- Activity level and costs associated with MEMP staff
- Participation in MEMP training.

It is recommended that the department track certain “environmental indicators” that would give evidence of the impact the MEMP program may have on the environmental quality of the State of Missouri. Such indicators may include waste generation, discharge statistics, energy usage, water usage, regulatory compliance statistics, or any of a number of other possible metrics. These environmental indicators can be used to compare the performance of members to the regulated community as a whole, compare the environmental impact of members prior to and after participation in the program, and to indicate the impact of the MEMP program as a whole. Data to support these indicators may be obtained from departmental monitoring, or from the MEMP member organizations. Members will monitor their own environmental performance and share results with the department as part of the annual reporting.

6 PROGRAM EVALUATION AND CONTINUAL IMPROVEMENT

The gatekeepers, on an ongoing basis, will evaluate the performance of the MEMP program and seek to identify potential program improvements. MEMP steering committee should regularly meet with the gatekeepers to discuss program performance, opportunities for continual program improvement and other relevant issues. The MEMP steering committee should submit a report summarizing the critical program performance information to the division directors and department director each quarter or at another frequency specified by the directors.

In addition to this ongoing evaluation, the MEMP steering committee should meet at least annually with the department director, the directors of WPSCD, ALPD, and OAC and other personnel as deemed appropriate by the department director. The purpose of the meeting is to evaluate the performance of the MEMP program, establish direction and goals for the program, identify areas where corrective action may be required and identify actions for continual improvement of the program. The outcome of this meeting should provide direction for the operation of the MEMP program.

The MEMP is a voluntary activity. The voluntary nature of the MEMP relates both to members and the department. The department's involvement is contingent upon continuing funding appropriate to support MEMP. There is no application fee for MEMP, nor any statutory duty or other requirements that the department conduct this activity. The department position is the EMSs are valuable and should be promoted. However, the department cannot make an irrevocable commitment to carrying out the MEMP.

APPENDIX A

MEMP APPLICATION GUIDANCE

Missouri Department of Natural Resources

Missouri Environmental Management Partnership

Application Guidance

This guidance is intended to show applicants for the MEMP program the requirements for a complete application. Please do not submit your complete EMS, or all the individual documents that comprise your EMS. The application will be a 'snapshot' of your system. In most cases, a one or two paragraph summary describing each element required for an acceptable EMS will suffice.

Please complete the application cover sheet on the following page and use it for the first page of your application submittal. If you are using the editable electronic version of this guide, type your facility information over the descriptions provided. If using a paper copy, please format the facility information as shown. The Participant Conditions Statement should immediately follow the application cover sheet. Duplexing of application supporting materials is encouraged.

Department of Natural Resources

Missouri
Environmental Management Partnership

Application for Membership

Organization Name:

Facility Name if appropriate:

Facility Street Address:

Facility City and Zip Code:

Facility Latitude and Longitude:

Mailing Address if different than above:

Parent company name and mailing address, if any:

Facility EMS Contact Person Name and Title, telephone, fax, email:

Primary SIC or NAICS code of this facility:

This application is for the following MEMP classification:

Partner _____

Certified Partner _____

Advanced Partner _____

Certified Advanced Partner _____

Participation Conditions Statement

I certify that:

- I have read and agree to fulfill the participation conditions of the Missouri Environmental Management Partnership program which include:
 - implementation of an environmental management system that conforms to MEMP guidelines,
 - continual improvement of environmental performance,
 - submission of an annual report, and
 - acceptance of on-site evaluations of the environmental management system by the Department of Natural Resources personnel.
- I have personally examined and am familiar with the information contained in this application. The information contained in this application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state and local environmental requirements, and the facility has corrected identified instances of noncompliance or has a corrective action plan and schedule for achieving compliance in place for identified situations not already corrected;
- As part of our environmental regulatory system, my facility has a compliance-monitoring program to ensure future incidences of non-compliance will be addressed through appropriate corrective action.

I understand that my organization may voluntarily withdraw at any time during review of the application or after joining the Missouri Environmental Management Partnership by writing the department director.

I acknowledge that the Department of Natural Resources may accept participants into or remove them from the Missouri Environmental Management Partnership program.

I am fully authorized to execute this statement on behalf of my organization.

Name and Title: _____

Facility Name: _____

Facility Street Address: _____

Signature: _____ **Date:** _____

Facility Information (Narrative)

What is the nature of work activities at your facility and what are your products and services?

How many employees (full-time equivalents) currently work at your facility?

List any Missouri permit identification number(s) your facility may have, by program such as air construction permit, water pollution NPDES permit, etc. Include federal, state and local permits that apply to your facility.

Tell us of any planned changes in processes, products, services or materials handled that may affect your EMS and environmental performance.

EMS Information Required With Application

Facilities must have an operating Environmental Management System (EMS) that meets the required participation criteria for Partner, Certified Partner, Advanced Partner or Certified Advanced Partner classifications. Items listed below are required to document acceptability for the ten basic elements of the MEMP EMS for a Partner and additional participation criteria for the other classifications. Most elements may be documented with a one or two paragraph summary of what is in your EMS.

If you are applying for the Partner classification, please include the following with your application:

- Your EMS Environmental Policy Statement
- The complete list of identified environmental impacts
- A list of all legal and other environmental requirements including federal, state and local regulations and ordinances (a checklist is included in this guidance, but may not be comprehensive)
- A list or indication of the priority environmental impacts and legal requirements.
- Please describe the process used to track changes in legal requirements that may affect the facility. A short synopsis is sufficient
- Your EMS objectives and targets which relate to priority impacts and requirements
- A description of the process for reviewing and updating EMS objectives and targets and for setting new ones
- A chart of EMS responsibilities within the organization by functional title
- A summary of your record keeping and reporting procedures to document performance
- A description of your training program summarizing how training needs are identified and who is responsible for training, record keeping and follow up
- A summary of your emergency response plan, if you have one, including any specific requirements such as SPCC or 112 (r) and how the plan is being implemented. Do not submit the plan. If the emergency response element of the MEMP EMS does not apply to your facility, please state why
- A description of your plan for assessment and corrective action including an outline of procedures, schedule of assessments and how corrective action/response will be implemented with specific personnel responsibilities, including top management responsibilities
- List of any unresolved non-compliance situations and corrective / preventive actions being taken including time schedule for resolution

Note that compliance is for all federal, state and local environmental legal requirements and some may not be listed on the environmental requirements checklist.

If you are applying for the Certified Partner classification:

In addition to the Partner classification requirements, please indicate whether the facility is:

Yes No

➤ ISO 14001 certified

If yes, please include a letter from the certifying organization (registrar) with the date and period of certification. If certified more than one year, provide a dated letter from the certifying organization documenting that the facility remains certified.

➤ Other 3rd Party certification

If yes, please specify what type of certification and include the name and contact information of the certifying organization and dated certification documentation.

Describe the role of the third party certification organization in assessment of the function, effectiveness of and conformance with the EMS, including applicable legal and other environmental requirements.

If you are applying for the Advanced Partner classification:

In addition to documenting that your EMS meets all requirements for Partner Level, please provide a summary on how you meet each of the following (limit description to no more than two pages per requirement):

➤ Document how your objectives and targets are more protective than those required by legal and other environmental requirements:

➤ Community involvement:

How do you identify and respond to community concerns? What do you do to involve the community and stakeholders in EMS activities?

How do you inform community members of important matters that may affect them?

How will you make the performance assessment report available to the public?

➤ **Pollution Prevention:**

Please summarize how will you implement the waste management hierarchy to achieve pollution prevention (source reduction).

Do you have a written pollution prevention plan?

Yes _____ No _____
(Do not send the plan)

If you are applying for the Certified Advanced Partner classification:

Please provide all the preceding documentation since this classification combines the required participation criteria of the preceding three classifications.

Regulatory Incentives

Through membership in the MEMP, a participating organization may receive certain incentives or benefits from the Missouri Department of Natural Resources. The incentives involve recognition, permitting, and enforcement considerations. Additionally, each organization that applies for MEMP membership is assigned a gatekeeper who becomes the single point of contact for the organization for issues related to the MEMP. The gatekeeper works with the organization during the application review process and remains the point of contact after the organization is accepted into the program.

As part of the application for MEMP membership, organizations are requested to identify particular incentives in which they have a special interest. There is a range of possible incentives for each participation classification. Additional incentives are possible on a case by case basis. The organization is encouraged to identify these in written materials supporting their application or in communications with their gatekeeper.

ENVIROMENTAL REQUIREMENTS CHECKLIST

This checklist may be used as a guide to determine what environmental requirements may apply for this application. It is not a comprehensive list of all possible requirements and should be used only as a framework to identify environmental requirements for this application.

The environmental requirements should include local, state and federal regulations that apply to this application.

Part 1

For this facility, is it subject to any Department of Natural Resources permits or other approvals from any of the following:

YES NO

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Air Pollution Control Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Public Drinking Water Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Water Pollution Control Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Solid Waste Management Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Hazardous Waste Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Land Reclamation Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Department of Natural Resources Region Office |
| <input type="checkbox"/> | <input type="checkbox"/> | Dam and Reservoir Safety Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Geological Survey Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Water Resources Program |
| <input type="checkbox"/> | <input type="checkbox"/> | Historic Preservation Office |

If your answer to any of the foregoing is "yes" then the permit or approval is an environmental requirement for this application.

Part 2

Department of Natural Resources regulations. Please read the appropriate section of the regulations (10 CSR xx) to determine which regulations are environmental requirements for this application.

The regulations are available for a nominal charge from the Secretary of State's office by calling 573-751-4015 and asking for the appropriate title. They may also be viewed or downloaded at

<http://www.sos.state.mo.us/adrules/csr/current/10csr/10csr.asp>. Regulations are in PDF files and the free Adobe Acrobat reader is required to read them. Some sections are in more than one PDF file and require downloading a second file to continue reading the regulations.

Air Pollution Control Program (10 CSR 10)

NOTE: Chapters 2, 3, 4 and 5 are specific to geographic areas of the state. Chapter 6 rules apply throughout the state. Local air pollution control agencies in the city of St. Louis, St. Louis County, Kansas City and Springfield also have ordinances that are environmental requirements and must be included if the facility is located in one of these jurisdictions. Check with the local agency for their ordinances.

Chapter 2, Kansas City metro area (Jackson, Cass, Clay, Platte, Ray and Buchanan counties). State regulations are in addition to Kansas City local ordinances.

Chapter 3, Outstate Missouri area

Chapter 4, Springfield-Greene County area (additional to city of Springfield local ordinances)

Chapter 5, St. Louis metro area (St. Louis county and city, Jefferson County, St. Charles county and Franklin county). State regulations are in addition to St. Louis City ordinances and St. Louis county regulations.

Chapter 6, Statewide rules

Public Drinking Water Program (10 CSR 60)

Regulations of this program apply to drinking water systems, public and private. Systems are covered if:

The system provides water for human consumption to 15 or more service connections or dwelling units.

The system provides water to an average of 25 individuals daily at least 60 days of the year.

Water Pollution Control Program (10 CSR 20)

Does the facility discharge to waters of the state?

Does the facility operate a treatment system?

Will wastewater or cooling water be discharged into a ditch or body of water?

Will wastewater or sludges be disposed on site?

Does the facility have a storm water management plan?

Does the facility have process or transport areas exposed to precipitation?

Is the facility a confined animal feeding operation?

Does the facility have pretreatment requirements?

Solid Waste Management Program (10 CSR 80)

Does the facility:

Have on-site disposal or burial of solid waste?

Process, treat or transfer any infectious waste from off-site?

Process, treat or transfer any mixed solid waste from off-site?

As part of normal business, regularly store or handle waste tires?

Hazardous Waste Program (10 CSR 20 and 25)

Read the fact sheet "Does Your Business Generate Hazardous Waste?" on line at

<http://www.dnr.state.mo.us/oac/pub117.pdf> or call Outreach and Assistance at 1-800-361-4827 and ask for Publication 117.

Does the facility:

Generate, transport, bury, treat or store liquid waste, industrial waste, wastewater treatment plant sludge or any wastes that might be corrosive, flammable, reactive or toxic?

Use any chemicals in the manufacture of a product or in providing a service to the consumer?

Have any underground storage tanks on the property?

Land Reclamation Program (10 CSR 40 and 45)

Is the facility a surface mine of gravel, limestone, granite, traprock, tarsands, clay, barite, sandstone, oil shale, sand or shale?

Are you exploring for or mining coal?

Does the facility dispose of wastes from mining metallic minerals?

Dam and Reservoir Safety Program (10 CSR 22)

Is there a man-made impoundment which is 35 feet or more in height from the lowest point of the toe to the crest elevation?

Will any such impoundment be constructed on the facility?

Geological Survey Program (10 CSR 23)

Does the facility do soil borings for mineral, oil or gas exploration?

Are there or will there be, groundwater assessment or investigation wells?

Is there or will there be, injection of fluid into the soil or groundwater?

Is oil or gas produced?

Water Resources Program

The Water Resources Program does not have a section of the CSR's. It is enabled by statute in Chapter 256 of the Revised Statutes of Missouri (RSMo). Statutes may be read on line at <http://www.moga.state.mo.us/homestat.asp>. Many libraries will also have copies of the state statutes. If not, check the county court house.

Does or will the facility pump or divert 100,000 gallons or more of water per day from a well or a surface water source?

Or, is water supplied to the facility by pumping or diverting water at seventy gallons per minute or more from a well or surface water source?

FEDERAL REGULATIONS

Federal regulations that apply to operation of the facility are also environmental requirements for this application. These are found in the Code of Federal Regulations which can be obtained from the Government Bookstore in Kansas City at the Bannister Mall, ordered from the Government Printing Office, or searched on line at:

<http://www.access.gpo.gov/nara/cfr/cfr-table-search.html#page1>

It is also recommended that applicants who are unsure of whether federal regulations apply, search the Environmental Protection Agency home page, www.epa.gov. You may also call the Environmental Assistance Office at 1-800-361-4827 for help in determining if there are applicable federal regulations.

LOCAL REQUIREMENTS

Requirement or permits established by local air pollution control agencies.

Requirements related to releases of wastewater to a publicly owned treatment works, including pretreatment requirements.

Requirements related to the releases of stormwater or other wastes to publicly owned stormwater drainage systems and storm sewers.

Other local environmental regulations.

APPENDIX B

MEMP ENVIRONMENTAL MANAGEMENT SYSTEM STANDARD AND REVIEW GUIDE

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Missouri Environmental Management Partnership

MISSOURI ENVIRONMENTAL MANAGEMENT SYSTEM STANDARD AND REVIEW GUIDE

INTRODUCTION

This document presents the standards that the Missouri Department of Natural Resources (the department) staff will apply during on-site assessments and other reviews of the Environmental Management System (EMS) developed by an organization for participation in the Missouri Environmental Management Partnership (MEMP). A secondary use of this document is to serve as a guideline for an organization developing and maintaining an EMS to understand the factors the department will consider and apply in review of their program.

The MEMP is the program through which the department encourages businesses, local governments, educational institutions, not for profit organizations, farms, state agencies and other organizations to improve their environmental performance by developing and implementing an EMS. An EMS is an organized, voluntary and coordinated process of planning activities, responsibilities, procedures and resources for developing, implementing and maintaining an environmental policy.

MEMP includes four classifications of EMS that may be implemented through two distinct pathways. Included are a basic EMS, a third party certified EMS, an EMS with characteristics that go beyond current regulatory requirements, and an EMS that has all of the characteristics. The four classifications are: Partner, Certified Partner, Advanced Partner and Certified Advanced Partner.

An organization that participates as a Partner in the MEMP must document conformance with the ten basic elements of an EMS, and demonstrate consistent and on-going implementation of the EMS accepted by the department. The EMS must be documented at the outset through the MEMP application to trigger possible incentives by the department. The Partner criteria are based on self-verification and the organization must provide annual documentation of conformance with all ten elements to the department. The department may perform in facility assessments and other reviews to verify EMS implementation.

The ten basic elements of a MEMP Environmental Management System are:

1. Environmental Policy Statement
2. Environmental Impacts
3. Legal and Other Requirements
4. Objectives and Targets
5. Roles and Responsibilities
6. Record Keeping and Reporting
7. Training
8. Emergency Response
9. Assessment
10. Corrective Action

The elements are fully described later in this document.

In order for an organization to qualify as a Certified Partner in the MEMP, all requirements of the Partner classification must be met. In addition a Certified Partner must be certified to ISO 14001 or another EMS standard that includes third-party certification. The department will review and verify the certification.

To be an Advanced Partner in the MEMP, an organization must meet all of the requirements of the Partner classification. Further, the organization must satisfy the following:

- The organization must have defined objectives that specify environmental standards more protective than those in applicable legal requirements (i.e. beyond compliance);
- As part of its commitment to and demonstration of continual improvement of its environmental performance through its EMS, the organization must advance along the waste management hierarchy (reduce, reuse, recycle, effectively treat, safely dispose) with an end result of pollution prevention (source reduction);
- The organization must provide, on an annual basis, a written report of performance assessment results to the department;
- The organization must regularly communicate with and seek feedback from the local community and its other stakeholders on performance assessment results and the status of the EMS.

A Certified Advanced Partner in the MEMP is one that fulfills all of the requirements of the other three classifications. That is, the organization's EMS conforms to the ten basic MEMP elements, is certified by an approved third party, and includes the program elements required for an Advanced Partner.

Definitions

Continual improvement: The process of on-going enhancement of the environmental management system to better overall environmental performance in line with the organization's environmental policy.

Criteria: Standards upon which a decision or judgment is based; parameters to which the applicant's EMS elements are compared to determine acceptability.

Document: Any photographic or written record, paper or electronic, which may be used to determine acceptability.

Documentation: One or more documents used in determining acceptability.

EMS: An EMS is an organized, voluntary and coordinated process of planning activities, responsibilities, procedures and resources for developing, implementing and maintaining an environmental policy.

Environmental Policy: A documented statement by the organization of its intentions and principles in relation to its overall environmental performance which provides a general course of action and a framework for the setting of its environmental objectives and targets.

Environmental Impact: A beneficial or adverse effect on the environment wholly or partially resulting from an organization's activities, products or services.

Environmental Issues: Conditions or situations associated with an organization's operation that may relate to its environmental impact, compliance status, employees or community.

Environmental Objective: A positive outcome or condition, arising from the environmental policy and related to significant impacts, issues and legal requirements, that an organization sets itself to achieve in accord with a specified time schedule, and which is quantified where practicable.

Environmental Target: Detailed output or performance requirement, quantified where practicable, that arises from an environmental objective and needs to be accomplished in order to achieve that objective.

Organization: A company, corporation, enterprise, association, authority, agency or other entity, whether incorporated or not, private or public, that has a recognized purpose and function.

Pollution Prevention: The use of materials, processes or practices that reduce or eliminate the creation of pollutants or wastes at the source. It includes practices that reduce the use of hazardous or nonhazardous materials, energy, water or other resources as well as those that protect natural resources through conservation or more efficient use.

Similar words and terms are defined in other EMS programs and standards. If generally consistent with the preceding definitions, they are acceptable for use in MEMP EMSs. Note that the ISO 14001 definition of “prevention of pollution” is not to be interchanged with the above definition of “pollution prevention”.

EVALUATION STANDARDS

Standards of acceptability for each element of the four MEMP classifications are presented in the following sections. The sections present:

- The element title,
- The element statement,
- The requirements for minimum acceptability of element.

If any one of the minimum requirements for any of the elements is not fulfilled, the EMS will not be considered as conforming to MEMP program provisions. Certain EMS components are not required for each EMS classification. These are indicated in the descriptions of the requirements for acceptability. While the elements are described individually, the EMS should tie the 10 elements together in a way that ensures that they function as a coordinated system, not a collection of separate and independent elements.

1. Environmental Policy Statement

The organization must have prepared a written statement of its policy regarding environmental issues, including impact on the environment, adherence to applicable statutes, regulations and permits, and commitment to continual improvement of environmental performance through its EMS.

Requirements for Acceptability

- 1.1 The policy has been established by top management in the organization or operating unit. This is typically demonstrated by a dated signature of the appropriate manager on the policy document itself accompanied by information or a title that describes the manager's scope of authority.
- 1.2 The policy is appropriate for the organization, and encompasses its activities (e.g. manufacturing, service and products) and the breadth of its environmental impacts. The policy must "fit" the organization in terms of scale or scope, address all impacts including the possibility of unrecognized ones, and not state or imply exclusions (for example, covers all environmental issues except for hazardous waste).
- 1.3 The policy states that the organization, on an on-going basis, will advance the EMS toward higher and fuller levels of environmental achievement and performance.
- 1.4 The policy must commit the organization to compliance with applicable environmental statutes, rules and permits. The Advanced Partner EMS and the Certified Advanced Partner EMS must call for performance levels more protective than those required by applicable legal requirements.

- 1.5 The policy provides an orientation and direction for the overall EMS, and is the frame of reference for its objectives and targets.
- 1.6 The policy should be maintained as a written or electronic document.
- 1.7 Availability of the policy to all employees is a positive characteristic of the Partner EMS; it is required for the Certified Partner EMS, the Advanced Partner EMS and the Certified Advanced Partner EMS. Whether and how the policy is available to employees is to be determined during assessment and review.
- 1.8 Availability of the policy to the public is a positive characteristic for the Partner EMS; it is required for the Certified Partner EMS, the Advanced Partner EMS and the Certified Advanced Partner EMS. Whether and how the policy is available to the public is to be determined during assessment and review.

2. ENVIRONMENTAL IMPACTS

The organization must have evaluated the actual or potential impacts on the environment from current or near future activities and conditions and must have defined procedures to direct activities relative to environmental impacts.

Requirements for Acceptability

- 2.1 The critical requirement is comprehensiveness in relation to the organization's activities, products, services, facility location(s) and materials being transported, produced, used and stored, and its use of air, land, water and energy resources. Not every environmental impact is significant in terms of its likelihood, severity or potential severity, scale and frequency. However, this component of the EMS must demonstrate that a comprehensive evaluation of the organization's effects, and potential effects, on environmental quality has been conducted. This includes conditions that exist because of past activities.
- 2.2 Omission of environmental impacts that seem obvious or logical to the department reviewer, given the organization's activities, products, services and facility location(s), is sufficient basis to seek clarification and amplification from the organization.
- 2.3 As part of the evaluation of environmental impacts, using a comparative process, the organization shall determine which of the impacts have greater significance or other features that cause them to have priority to be addressed in near-future actions. The basis for determining

significance and priority should be outlined in the procedures related to environmental impacts.

The possible environmental impacts that an organization must evaluate include, but are not limited to: air emissions and pollution, hazardous and solid waste generation, liquid waste generation, drinking water production and use, wastewater generation and disposal, surface and subsurface land disturbance, energy usage, storage of solid and liquid materials, accidental release or spill potentials, the toxicity of materials or products and transportation related issues. As part of the commitment to continual improvement of environmental performance through the EMS, an organization shall work to develop and provide products or services that have minimal environmental impact in their production and their use, are safe when used as intended, are efficient in their consumption of energy and natural resources when used, and can be reused, recycled, or treated or disposed of safely. This element of the commitment to continual improvement of the EMS should be an environmental policy concept or longer-term objective for Partners and Certified Partners; it should be reflected in one or more of the objectives of Advanced Partners and Certified Advanced Partners.

3. LEGAL AND OTHER REQUIREMENTS

The organization must have identified the legal requirements for its operations, including relevant environmental laws, regulations and permits, and have a process for tracking any changes in these requirements.

Requirements for Acceptability

- 3.1 The organization has considered and identified its legal requirements that may result from all federal, state and local environmental statutes, laws and ordinances and related rules, regulations and permits.
- 3.2 The organization should have a process for tracking any changes in the legal requirements and their applicability to the organization. A desirable characteristic of the tracking process for the Partner EMS is that it is proactive in how it accesses and identifies legal requirements. The tracking procedure for the Certified Partner EMS, the Advanced Partner EMS and the Certified Advanced Partner EMS must be proactive in accessing and identifying legal requirements and must have a method of communicating legal requirements to employees.
- 3.3 If an organization adheres to the standards and accepted practices of a business, industry or professional association and references these in its MEMP EMS, as part of its assessment review, the department will request copies of the standards and take them into account during the review.

4. OBJECTIVES AND TARGETS

The organization must have established positive objectives relevant to the significant environmental issues and impacts and to the legal and other requirements. The organization also must have established targets necessary for achieving the stated objectives. A documented procedure for review and update of objectives and targets, as well as for establishing new objectives and targets, must be in place.

Requirements for Acceptability

- 4.1 The objectives and targets must be consistent with the environmental policy including the twin commitments to compliance with legal requirements and to continual improvement of the EMS. For the Advanced Partner EMS and the Certified Advanced Partner EMS, the organization must have defined objectives that specify environmental standards and targets more protective than those required by applicable legal requirements.
- 4.2 The objectives are the overall goals of the EMS and must reflect the significant environmental impacts and legal requirements. In view of the commitment to continual improvements of the EMS, an organization does not need to address all of the identified environmental impacts and legal requirements in the initial EMS or in its periodic assessments and annual documentation of conformance.
- 4.3 The MEMP EMS should have an overall objective of compliance with legal requirements on an on-going basis. The organization should have a process for identifying violations of legal requirements, communicating the existence of a violation to appropriate employees and managers, and initiating prompt and effective corrective action. The existence of violation that is not the subject of a corrective action process is sufficient basis for a determination of nonconformance with the MEMP EMS.
- 4.4 The organization should have a documented procedure for review and update of the objectives and targets and establishing new objectives and targets. The procedure also should encompass re-evaluation of existing, or identification of new environmental impacts and legal requirements, and an occasional review of the environmental policy to assess its continuing appropriateness.

5. ROLES AND RESPONSIBILITIES

The organization must have defined those roles primarily responsible for implementation of the EMS and must have defined the responsibilities, accountabilities and authorities of each role in the organization that has involvement in the EMS.

Requirements for Acceptability

- 5.1 Top management should commit to providing the necessary staff, training, technology and financial resources essential for implementation of the EMS.
- 5.2 Top management should assume or delegate responsibility for implementation of the EMS.
- 5.3 EMS responsibilities by specific position in the organization should be documented. This can be in the form of position descriptions, organization charts that indicate types and levels of responsibilities and reporting relationships, or similar documents.
- 5.4 An individual employee, or several specific employees, irrespective of other duties, should be responsible for:
 - 5.4.1 Ensuring full implementation of the EMS,
 - 5.4.2 Internally communicating about EMS performance to other employees,
 - 5.4.3 Reporting on EMS performance to top management,
 - 5.4.4 Documentation of EMS performance,
 - 5.4.5 Receiving and responding to communications about the EMS and documenting the communications, and
 - 5.4.6 Serving as the point(s) of contact between the organization and the department about the EMS.
- 5.5 Top management, or the employee(s) responsible for EMS implementation, should assure that all employees are aware of the environmental policy. A procedure for internal communication of the environmental policy should be in place. This is a positive characteristic of the Partner EMS and a requirement for the Certified Partner EMS, the Advanced Partner EMS and the Certified Advanced Partner EMS.
- 5.6 Top management, or the employee(s) responsible for EMS implementation, should assure that all employees who are actively involved in carrying out EMS activities receive training appropriate for, and are able to competently perform, their roles and responsibilities. The ability to effectively accomplish EMS responsibilities should be a part of the overall evaluation process of employees.

- 5.7 Organizations with Advanced Partner EMS and Certified Advanced Partner EMS should indicate who is responsible for external communication about EMS performance and status to the organization's local community and other stakeholders.

6. RECORDKEEPING AND REPORTING

The organization must have documented processes for the collection and documentation of information about operating procedures related to the implementation of the EMS.

Requirements for Acceptability

- 6.1 The organization should have processes and procedures (e.g. standard operating procedures) related to implementation of all EMS elements. This includes the procedures for documenting EMS activities and outcomes, and procedures for maintaining the documentation in a manner that can be readily retrieved and is protected from damage or loss.
- 6.2 A critical element of the record keeping, or documentation, procedure should be a description of how the organization identifies external and internal documents and records staff and management need to fulfill their EMS roles and responsibilities.
- 6.3 The organization's record keeping and reporting procedures must address control of documents so that:
- 6.3.1 They can be located
 - 6.3.2 They are periodically reviewed and revised and accepted for continuing use.
 - 6.3.3 Current versions of necessary documents are readily accessible when and by whom they are needed;
 - 6.3.4 Out-of-date documents are positively removed from use in all locations;
 - 6.3.5 Out-of-date documents to be retained for legal, historical or knowledge preservation purposes are suitably identified and archived (i.e. separated from the active files); and
 - 6.3.6 Documents that are necessary for EMS implementation and are also confidential business records are so identified and any restrictions on access are specified.
- 6.4 The specification by the organization that many EMS-related documents, or the other documents essential for determining EMS progress, are confidential business records is sufficient basis to stop review of the MEMP EMS and seek clarification and reconsideration by the organization. The inability of the department to document nonconformance with the MEMP EMS does not constitute conformance.

- 6.5 EMS documentation may be maintained as paper or electronic records or a combination of both.

7. TRAINING

The organization must have a process for ensuring that employees are familiar with the requirements of the EMS and have the training necessary to capably execute their roles and responsibilities.

Requirements for Acceptability

- 7.1 The organization should identify and provide, on an on-going basis, appropriate training to ensure:
 - 7.1.1 General knowledge of the environmental policy and EMS components throughout the organization, and
 - 7.1.2 Accomplishment of the EMS components by employees with primary roles and responsibilities.
- 7.2 The organization should have documented processes indicating how:
 - 7.2.1 Employees training needs are identified,
 - 7.2.2 A training plan is developed to address both general information needs and detailed, targeted needs of specific individuals or groups,
 - 7.2.3 The training plan is carried out (personnel, responsibilities and training timetables specified),
 - 7.2.4 Record-keeping of training and attendance is maintained, and
 - 7.2.5 The training is evaluated and updated to assure on-going appropriateness.
- 7.3 If the organization employs contractors or temporary employees, their potential training needs related to the EMS should be addressed in the training plan.

8. EMERGENCY RESPONSE

The organization must have documented procedures for responding to, mitigating and reviewing incidents or environmental emergencies.

Requirements for Acceptability

- 8.1 Documentation should be maintained that demonstrates how the organization has reviewed its risks for uncontrolled releases of hazardous

materials or process wastes to air, water or land and has emergency plans and procedures established to ensure an appropriate response.

8.2 The organization should identify and address requirements related to:

8.2.1 Coordination with local first responders, fire fighters and the Local Emergency Planning Commission (LEPC),

8.2.2 Emergency Planning and Community Right to Know requirements,

8.2.3 Section 112(r) Risk Management Planning pursuant to the Clean Air Act Amendments of 1990, and

8.2.3 Spill prevention, control and counter measures (SPCC) requirements of the Federal Oil Pollution Control Act, and

8.2.4 Other environmentally related spill and emergency response procedures.

8.3 The organization should have a plan for and a general schedule of periodic tests of the emergency response plan and procedures.

8.4 The organization should periodically review and determine the continuing appropriateness of its emergency response procedures.

9. ASSESSMENT

The organization must have documented procedures and a schedule for assessments of the function and effectiveness of and conformance with the EMS, including applicable legal requirements.

Requirements for Acceptability

9.1 The organization should have a system in place for monitoring and measuring performance related to the objectives and targets. The system description should address the types of data to be collected, how data accuracy and reliability will be assured, and the data maintenance and dissemination procedures

9.2 The system for monitoring and measurement should describe personnel roles and responsibilities, methods of accomplishment (e.g. internal audit, external audit or both) and frequency of specific assessment events. For the Certified Partner EMS and the Certified Advanced Partner EMS, information should describe the role of the third-party certification organization, and summary records (not necessarily the detailed audits and reports) of the third-party certification organization should be available to the department.

10. CORRECTIVE ACTION

The organization must have documented processes for review of assessment information, investigation of any identified nonconformance with the EMS, and action to correct or address the nonconformance.

Requirements for Acceptability

- 10.1 Procedures should describe the methods and the frequency with which organization management, including top management, will review performance related to the EMS objectives and targets.
- 10.2 Procedures should indicate how organization management, including top management, will review and respond to the result of external audits conducted by third party certification organizations for Certified Partner EMS and Certified Advanced Partner EMS.
- 10.3 Procedures should indicate how the organization will determine and track conformance with the objectives, targets and the other EMS elements, and identify nonconformance.
- 10.4 Responsibilities of employees to initiate corrective actions related to nonconformance with the EMS elements ahead of full management review and reaction to the nonconformance should be documented.

11. GENERAL REQUIREMENTS FOR ACCEPTABILITY

- 11.1 For the Partner EMS and the Certified Partner EMS, annual reporting must document conformance with the ten basic EMS elements. For the Advanced Partner EMS and the Certified Advanced Partner EMS, annual reporting must provide a written report of the performance assessment results of internal and external EMS audits or other evaluations.
- 11.2 For the Advanced Partner EMS and the Certified Advanced Partner EMS, the organization should submit information describing how, and with what frequency or under what circumstances, it regularly communicates with its local community and other stakeholders on performance assessment results and the status of the EMS.
- 11.3 The EMS must reflect or explicitly reference the waste management hierarchy, which, beginning with the most desirable, may be stated: reduce, reuse, recycle, effectively treat, safely dispose. "Reduce" is also termed reduction, source reduction, waste minimization and pollution prevention (P2), and sometimes includes waste reuse that occurs in the facility in which the waste was generated. For the Partner EMS, the environmental policy and EMS does not need to call for immediate or near future progress along the waste management hierarchy beyond safe

disposal and effective treatment. For the Certified Partner EMS, the environmental policy and EMS should reflect appropriate use of a full range of waste management and control options under the waste management hierarchy. For the Advanced Partner EMS and the Certified Advanced Partner EMS, the environmental policy and EMS should commit the organization to an end result of pollution prevention as a primary and current, or near-future, component of its waste management strategy and processes.

- 11.4 Documented procedures related to the EMS shall outline how top management will periodically review the overall content and structure of the EMS to ensure its continuing suitability and effectiveness. The management review shall address all elements of the EMS taking into account assessment results, changes in the organization's situation, viewpoints of the local community and stakeholders and other factors.

APPENDIX C

CONFERENCE CONCILIATION AND PERSUASION POLICY

**Division of Environmental Quality
Conference, Conciliation and Persuasion
Policy Statement and Expectations**

Policy Statement:

It is the policy of the Division of Environmental Quality (DEQ) to employ Conference, Conciliation and Persuasion (CC&P) upon and finding and written notification of non-compliance with statutes, rules, permits or other enforceable actions in our jurisdiction. Exceptions to the use of CC&P may occur if the violations 1) represent an imminent and serious threat to human health and environmental quality, 2) appear to be intentional or a result from negligence, or 3) have a required response specified in rule or guidance. CC&P shall have, as the minimum, the same meaning as portrayed in our various environmental statutes.

Expectations:

It is the expectation of the division that CC&P will be an effective tool and will be used to an extent that realizes significant compliance gains without the burden of further enforcement.

The division expects that those providing CC&P be diplomatic, courteous, respectful, willing to consider options and convincing about the need to return the facility or site to compliance. CC&P, by design, should be a cordial exercise that will fail only because of the violator's inability or unwillingness to comply.

The non-complier shall be advised of the ramifications of the violation and the purpose and nature of CC&P. CC&P is not indefinite and shall be focused and time limited. It shall, after reasonable time, result in compliance, a compliance schedule or assignment as an enforcement case. Reasonable time for CC&P shall be agreed upon by the regional and program offices and conveyed through I&E manuals or other forums available for management review. The Enforcement Coordinating Committee (ECC) will work to resolve any inconsistencies among programs' agreed upon reasonable times or assure that any inconsistencies have a sound rationale. A time expectation may be lengthened on a case-by-case basis with notice given to the supervisor and documentation sent to the file. All CC&P activities shall be well documented and shall be made a part of the facility's permanent record.

Where CC&P timing agreements have not been made, CC&P 1) shall not exceed 90 days without prior contact with the applicable program, and 2) should not exceed 180 days to complete unless a specific written compliance schedule is agreed to by the facility owner and operator providing for a longer period of time.

To assure that CC&P does not continue indefinitely, offices responsible for CC&P shall employ methods to tract and ensure follow-up with non-compliers. Each programs' I&E manual will specify when CC&P starts (e.g. issuance of first NOV, inspection report which notes violations) and provide guidance on the length of time to apply CC&P before enforcement is requested.

With oversight by the ECC, clear specific instructions on CC&P expectations, methods, documentation, tracking and any exceptions shall be provided in the program I&E manuals. To demonstrate effectiveness, offices conducting CC&P should be able to specify:

- ▶ Which facilities and/or responsible parties are involved in CC&P at any particular time;

- ▶ When did CC&P begin for a facility and/or the responsible party;
- ▶ The current status of the facility and/or the responsible party with respect to its corrective actions or schedule, and;
- ▶ Outcomes of past CC&P, i.e. returns to compliance or referrals for enforcement.

CC&P training shall be provided to field personnel who have the responsibility for carrying out CC&P. With planning assistance from DEQ Administration and the ECC, formal program specific training will be developed and provided on a continuing basis at least annually.

Technical assistance may be an element required in CC&P. When significant technical assistance is required to achieve compliance, the involved program and region should jointly decide if that assistance is most appropriately provided by region, program or Technical Assistance Program staff, or a combination. TAP, once involved, is responsible for notifying the regional or program office of progress toward compliance.

To assure CC&P receives appropriate attention, the programs and regions shall specify time for CC&P in work plans and the division shall accompany that with specific guidance on CC&P time accounting.

Original document signed by John A. Young, DEQ Director, on August 30, 1999.

APPENDIX D

MISSOURI DEPARTMENT OF NATURAL RESOURCES

MISSOURI ENVIRONMENTAL MANAGEMENT PARTNERSHIP

ANNUAL REPORT INSTRUCTIONS

MISSOURI ENVIRONMENTAL MANAGEMENT PARTNERSHIP

ANNUAL REPORT INSTRUCTIONS

General Instructions:

All organizations participating in the Missouri Environmental Management Partnership (MEMP) must provide the Department of Natural Resources, Environmental Assistance Office (EAO) with an annual report regarding the status of their Environmental Management System (EMS). This report should be based on an internal assessment or third-party audit completed no more than three months before submission of the report. The report should be submitted in accord with the schedule set at the time of entry into the MEMP, or a schedule subsequently accepted by the department.

Attached to these instructions is a suggested cover sheet for a MEMP annual report. Pages presenting the required information should be attached to the cover sheet.

Definitions:

Nonconformance: The failure to fulfill a requirement of a MEMP EMS element or participation condition.

Minor Nonconformance: A single lapse in an organization's conformance with specified requirements.

Major Nonconformance: The failure to address any one or more of the basic MEMP EMS elements or to fulfill any of the participation conditions; sufficient minor nonconformance to lead to the conclusion that a pattern exists and the requirements are not effectively implemented, or serious noncompliance with applicable regulatory requirements.

Contents of the Annual Report:

For all facilities, the report should address each of the MEMP EMS elements:

- a. Environmental Policy Statement
- b. Environmental Impacts
- c. Legal and Other Requirements
- d. Objectives and Targets
- e. Roles and Responsibilities
- f. Recordkeeping and Reporting
- g. Training
- h. Emergency Response

- i. Assessment
- j. Corrective Action

Certified and Certified Advanced Partners must also address:

- k. The current status of their 3rd party certification

Advanced and Certified Advanced Partners must also address:

- l. Communication with the community and other stakeholders

Partners and Certified Partners: Specify changes to the basic EMS elements that were made during the year. For each lettered item, state the number of minor and major nonconformances as noted in the most recent internal assessment or 3rd party audit. The current status of conformance for each lettered item should also be noted, and, if there was nonconformance during the year, what action was taken to correct deficiencies.

Advanced Partners and Certified Advanced Partners: Describe any changes to the basic EMS elements that were made during the year and the underlying reasons for those changes. For each lettered item, outline major activities of the past year. Also, for each lettered item, state the number of minor and major nonconformances as noted in the most recent internal assessment or 3rd party audit. The current status of conformance for each lettered item should be noted, and, if there was nonconformance during the year, what were the causes of the nonconformance and what action was taken to correct deficiencies.

Additional instructions for specific lettered items:

- a. The environmental policy commits the organization to continual improvement of the EMS. Describe activities that demonstrate the organization's continual improvement during the last 12 months with respect to EMS provisions. For Advanced and Certified Advanced Partners, also describe the steps or activities that demonstrate continual improvement with an end-result of pollution prevention (source reduction) (P2). Describe P2 practices being used. Describe P2 practices under consideration. Has a P2 plan been developed? If so, what is the status of implementation of the P2 plan?
- b. This should include a description of the status of compliance with legal requirements.
- c. Describe the organization's status toward implementation of objectives and targets and results achieved in the past year. Advanced and Certified Advanced Partners, address performance more protective than legal requirements. With respect to results achieved, the annual report should outline net reductions of waste releases, net reductions in use of energy and water, and other environmental protection measures under the EMS.

- d. Advanced and Certified Advanced Partners, describe the activities during the last 12 months aimed at the community and other stakeholder information and involvement regarding the organization's EMS. What were the results? What were the major issues raised by the community and other stakeholders? Has the organization's definition of community or stakeholder been changed during the past year?

Member comments and suggestions:

Members of the Missouri Environmental Management Partnership are encouraged to mention and discuss their reactions to and suggestions about the MEMP program with their assigned gatekeeper at any time. Comments about program modifications are encouraged and will be considered by the department as part of periodic program review and improvement activities. As an optional component of the annual report, a member may include MEMP program improvement suggestions.

Missouri Environmental Management Partnership Annual Report

FOR PERIOD: ____/____/____ to ____/____/____			
ORGANIZATION			
MAILING ADDRESS		CITY	STATE ZIP CODE
PHONE NUMBER	FAX NUMBER		WEB ADDRESS
MEMP STATUS <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> Partner Certified Partner </div> <div style="text-align: center;"> Advanced Partner Certified Advanced Partner </div> </div>			
EMS REPRESENTATIVE (PRINTED)		INTERNET E-MAIL ADDRESS	
SIGNATURE OF EMS REPRESENTATIVE		DATE	

Submit to: Missouri Department of Natural Resources
Environmental Assistance Office
P.O. Box 176
Jefferson City, MO 65102-0176

ATTENTION OF GATEKEEPER: _____

APPENDIX E

MISSOURI DEPARTMENT OF NATURAL RESOURCES

MISSOURI ENVIRONMENTAL MANAGEMENT PARTNERSHIP

On-site Evaluations of the EMS

Evaluation procedures are under development. Completion of the procedures is anticipated by December 31, 2002.

APPENDIX F

MEMP TRAINING

1. ACHIEVING SUPERIOR ENVIRONMENTAL PERFORMANCE IN MISSOURI

PURPOSE

The purpose of this training is to introduce general EMS concepts, MEMP program, and benefits.

AUDIENCE

The audience includes interested individuals, associations, organizations, employees of businesses and government entities, and others.

CONTENTS

- I. Introduction
- II. Description of EMS and major components (using the International Standards Organization (ISO) 14001 as the model)
- III. Name and briefly describe the other major standards – European Council Eco-Management and Audit Scheme (EMAS), Chemical Council of America Responsible Care Program, British Standards Institution (BS 7750)
- IV. Benefits of EMS
- V. Components and Characteristics of MEMP
- VI. Conclusion

TRAINER

Department Staff or Assistance Providers

DEPARTMENT RESOURCES

This involves three to six staff from the Environmental Assistance Office. The presenter would need to be very familiar with both general EMS and MEMP concepts. Several department staff have made presentations similar to what is described. Presentation development effort would be

modest. Expenses primarily would be staff time, information materials distributed and in-state vehicular travel.

TIME LINE

The department needs to have staff prepared to make these presentations beginning about two months before actual initiation of MEMP. There will be an on-going need for the presentation with most requests being during the first 12 to 18 months of the MEMP program.

2. CHARACTERISTICS OF ENVIRONMENTAL MANAGEMENT SYSTEMS

PURPOSE

The purpose of this training is to provide organizations sufficiently detailed information to make the decision to pursue an EMS.

AUDIENCE

The audience includes employees of organizations considering the development and implementation of an EMS.

CONTENTS

- I. Introduction
- II. Components of EMS
- III. Benefits of EMS
- IV. Level of effort and cost
- V. MEMP components
- VI. MEMP benefits
- VII. MEMP participant responsibilities
- VIII. Conclusion

TRAINER

Assistance providers or department staff

DEPARTMENT RESOURCES

This would involve four staff from Environmental Assistance Office probably working in 2 two-person teams. Staff trainers should have detailed knowledge of EMS and MEMP. Staff should have ISO 14001 Lead Auditor Training (see Class 10) or have completed Classes 7, 8 and 9. Several basic workshops have been prepared and presented; but they need updating and expansion. Development effort for the presentation would be moderate estimated to be about 5 staff days. Expenses would be for staff time, informational materials and in-state travel including mileage, meals and lodging.

TIME LINE

The workshop needs to be ready for presentation by the date that the MEMP program is initiated. There will be an on-going need for the presentation.

3. BUILDING YOUR MISSOURI ENVIRONMENTAL MANAGEMENT SYSTEM

PURPOSE

The purpose of this training is to provide detailed guidance for the development of EMS to the point at which the organization is ready to adopt and implement their EMS.

AUDIENCE

The audience is organizations that have chosen to develop an EMS.

CONTENTS

- I. Introduction
- II. Training on the components of the selected EMS model (for example MEMP has 10 components and ISO 14001 has 5 major components with 15 subcomponents)

- III. Application requirements of the MEMP program
- IV. Responsibilities of the MEMP participant
- V. Conclusion

TRAINER

Assistance providers or department staff

DEPARTMENT RESOURCES

This would involve four to six staff primarily drawn from the Environmental Assistance Office probably working in teams of two to three staff for each workshop. Staff would need detailed knowledge of EMS and MEMP. Staff would need to have ISO 14001 Lead Auditor Training (see Class 10). Development effort related to this workshop would be significant amounting to about 40 staff days over three to four months. If offered in a block, the workshop would be a three to four day session. An alternative concept is to offer the workshop over a period of five to nine months at one day per month with each day focused on a major EMS component. Participants have “homework” to complete before the next session. At the end of the training, the participants have an EMS complete or nearing completion. Department expenses would include staff time, a significant amount of information materials, mileage, lodging and meals.

TIME LINE

The workshop needs to be ready to offer about three months after the initiation date of the MEMP program. There will be an on-going need for the training.

4. IMPLEMENTATION TRAINING AND ASSISTANCE

PURPOSE

The purpose is to provide organizations with tools and techniques they need to implement their EMS and improve their environmental performance.

AUDIENCE

The audience is organizations with an adopted EMS.

SUGGESTED TOPICS AND RELATED ACTIVITIES

- a. Pollution Prevention/Source Reduction (by sector)
- b. Life Cycle Analysis/Extended Producer Responsibility
- c. Environmental/Full Cost Accounting
- d. Community Involvement Methods
- e. Adult Education "Train the Trainer"
- f. Internal Auditor Training
- g. Individualized, Organization Specific Training
- h. Publications
- i. On-site assessment of regulatory compliance, pollution prevention and EMS
- j. Resource Tools
- k. Others as needed

TRAINER

Assistance providers or department staff

DEPARTMENT RESOURCES

Two to six staff from the Environmental Assistance Office primarily offering assistance. Department staff may provide some of the training, in particular in pollution prevention, but probably would not have a leading training responsibility for these topics. Development effort would be modest since Environmental Assistance Office presently provides pollution prevention training and the range of assistance activities. Expenses would be for staff time, information materials and in-state mileage with some lodging and meals possible.

TIME LINE

Organizations should be prepared to offer the training and assistance beginning about four to six months after the initiation date of the MEMP program. There would be an on-going and increasing need to for this training and assistance over time.

5. INTRODUCTION TO EMS FOR ASSISTANCE PROVIDERS

PURPOSE

The purpose of this training is to provide detailed EMS information to employees of organizations that assist businesses and government entities.

AUDIENCE

The audience is assistance providers.

CONTENTS

- I. Introduction
- II. Components of EMS
- III. Benefits of EMS
- IV. Level of effort and cost
- V. Conclusion

TRAINER

Assistance providers of department staff

DEPARTMENT RESOURCES

This would involve two to four staff from the Environmental Assistance Office; these would be the same persons prepared to present Classes 2 and 3. Little additional preparation would be needed. Expertise needs would be the same as for Classes 2 and 3. Development efforts for

the department would be minimal. Expenses would be for staff time, information materials, and in-state travel.

TIME LINE

Workshops should be ready to present as of the date of MEMP initiation. Limited on-going training of new assistance organization staff would be needed.

6. INTRODUCTION TO MEMP FOR ASSISTANCE PROVIDERS

PURPOSE

The purpose of this training is to provide detailed MEMP information to employees of organizations that assist businesses and government entities.

AUDIENCE

Assistance providers (consultants, associations, colleges, universities, Small Business Development Center staff, Missouri Department of Economic Development, non-governmental organizations, chambers of commerce, etc.)

CONTENTS

- I. Introduction
- II. MEMP components
- III. MEMP benefits
- IV. MEMP participant responsibilities
- V. Conclusion

TRAINER

Department staff

DEPARTMENT RESOURCES

This would involve two to four staff from the Environmental Assistance Office; these would be the same persons prepared to present Classes 2, 3 and 5. Little additional preparation would be needed. Expertise needs would be the same as for Classes 2, 3 and 5. Development efforts for the department would be minimal. Expenses would be for staff time, information materials and in-state travel.

TIME LINE

Workshops should be ready to present as of the date of MEMP initiation. Limited on-going training of new assistance organization staff would probably be needed.

7. INTRODUCTION TO EMS AND MEMP FOR THE DEPARTMENT

PURPOSE

The purpose of this training is to provide general EMS and MEMP training to department staff who are not directly involved in the Missouri program.

AUDIENCE

The audience is the department staff.

CONTENTS

- I. Introduction
- II. Components of EMS
- III. Benefits of EMS
- IV. Level of effort and cost
- V. MEMP components
- VI. MEMP recognition and cooperative programs
- VII. MEMP participant responsibilities

VIII. Conclusion

TRAINER

Department Staff, and possibly assistance providers

DEPARTMENT RESOURCES

Two to four staff from the Environmental Assistance Office; these would be the same persons prepared to present Classes 2, 3, 5 and 6. Little additional preparation would be needed. Expertise needs would be the same as for Classes 2, 3, 5 and 6. Development efforts for the department would be minimal. Expenses would be for staff time, information materials, and in-state travel.

TIME LINE

Workshops should be ready to present as of the date of MEMP initiation. Limited on-going training of new department staff would probably be needed.

8. ADVANCED EMS TRAINING FOR THE DEPARTMENT

PURPOSE

The purpose of this training is to prepare department staff for direct and expert interaction with organizations developing and implementing an EMS

AUDIENCE

The audience is department staff directly involved with MEMP.

CONTENTS

- I. Introduction
- II. Identification of EMS models

III. Detailed description of common EMS components

IV. Benefits of EMS

V. Costs and efforts to implement an EMS

VI. Conclusion

TRAINER

Department Staff with Lead Auditor Training or appropriately qualified external trainer

DEPARTMENT RESOURCES

This involves two to four staff from the Environmental Assistance Office; these would be the same persons prepared to present Classes 2, 3 and 5 to 7. Little additional preparation would be needed. Expertise needs would be the same as for Classes 2, 3 and 5 to 7. Development efforts for the department would be minimal. Expenses would be for staff time, information materials, and in-state travel.

TIME LINE

Workshops should be ready to present as of the date of MEMP initiation. Limited (yearly) on-going training of department staff with newly assigned EMS/MEMP duties would probably be needed.

9. ADVANCED MEMP TRAINING FOR THE DEPARTMENT

PURPOSE

The purpose is to prepare department staff for direct and expert interaction with organizations developing and implementing an EMS for participation in MEMP.

AUDIENCE

The audience is department staff directly involved with MEMP.

CONTENTS

- I. Introduction
- II. Detailed description of MEMP components
- III. MEMP Recognition and Cooperative Programs
- IV. Costs and efforts to implement a MEMP EMS
- V. MEMP participant responsibilities
- VI. Internal MEMP processes within the department
- VII. Department Staff responsibilities under MEMP
- VIII. Conclusion

TRAINER

Department Staff

DEPARTMENT RESOURCES

Two to four staff from the Environmental Assistance Office; these would be the same persons prepared to present Classes 2, 3 and 5 to 8. Little additional preparation would be needed. Expertise needs would be the same as for the other Classes. Development efforts for the department would be minimal. Expenses would be for staff time, information materials, and in-state travel.

TIME LINE

Workshops should be ready to present as of the date of MEMP initiation. Limited (yearly) on-going training of department staff with newly assigned MEMP duties would probably be needed.

10. ISO 14001 LEAD AUDITOR TRAINING FOR THE DEPARTMENT

PURPOSE

The purpose of this training is to qualify department staff responsible for EMS training, application review and approval, and on-site facility EMS evaluations as experts in the leading EMS model.

AUDIENCE

The audience is selected department staff.

CONTENT

The content will be as required by ANSI-RAB. The training concludes with testing.

TRAINER

ANSI-RAB Certified Trainer

DEPARTMENT RESOURCES

The department sponsored an ANSI-RAB certified ISO 14001 Lead Auditor course. The course was offered in Jefferson City and involved 20 staff selected because of their EMS/MEMP training, review and future on-site evaluation responsibilities. Expenses were about \$20,000 for the certified training organization. There also were expenses for the cost of staff time to attend the session, and some in-state mileage, lodging and meal expenses for the two regional office staff involved. Average cost per person was about \$1,000 for the contractor provided “in-house” training. In comparison, it would have cost about \$2,700 to \$3,000 per person to send department staff to this type of training at a location determined by the contractor. This is based on training costs of \$1,700 to \$2,100 per person, and one week of out of state travel estimated at \$1,000 for airline transportation, lodging and meals.

TIME LINE

An ANSI-RAB certified session for ISO 14001 Lead Auditor training was conducted for the department staff on January 7 through 11, 2002. This training session was scheduled through a process of state bidding and award of contract. Under the contract, a second session offered by the same training provider may be scheduled prior to the end of calendar year 2002.

APPENDIX G

INTERNAL AND EXTERNAL MEMP PROMOTION

1. MEMP LOGO

PURPOSE / DESCRIPTION

The purpose is to provide a recognizable logo for MEMP informational materials and recognition. The logo should have some connection to the program either by use of the MEMP acronym or by some other environmentally recognizable icon, landscape or photo. May also prepare cover pages for reports and web site graphics.

FORMAT

The logo will be formatted as a full color computer graphic that can be sized for appropriate uses. A black and white version also will be necessary. The logo will be used on MEMP informational materials.

AUDIENCE

The audience is all MEMP customers and providers.

AUTHOR

The promotions and recognition subcommittees with guidance from the MEMP steering committee and other department graphics resources are responsible for developing the logo. A unifying theme will be needed if a set of logos are created for various levels or needs.

DUE DATE

The logo will be due by the MEMP program initiation date.

2. TRI-FOLD BROCHURE

PURPOSE / DESCRIPTION

The purpose is to provide general overview of the MEMP process and elements of the program.

FORMAT

The format will be a color tri-fold mailing insert or handout that will include the same information as on the web site. This would be distributed in an annual mailing sent by EAO and other offices as appropriate.

AUDIENCE

The audience is potential EMS organizations and other interested people and organizations.

AUTHOR

EAO will author the brochure with direction and oversight of the MEMP steering committee.

DUE DATE

The brochure needs to be ready by the time of program announcement. There is an ongoing need for the brochure.

3. MEMP WEB SITE

PURPOSE / DESCRIPTION

The web site will function as a clearinghouse for all information on the MEMP program. It will include information on the application and review process, downloadable application forms, department contact information, an explanation of the cooperative measures and

recognition, a list of up to date training schedules and lists of recognized MEMP partners. It will also include organizations that withdrew from MEMP or the membership of which was terminated by the department. Much of this information will also need to be available in hard copy format. The work product of the MEMP steering committee will provide a basis to build this Website.

FORMAT

The web site will be linked from each of the programs and from the department sites.

AUDIENCE

The audience is all MEMP members, training providers and interested people.

AUTHOR

EAO acting at the direction of the MEMP steering committee will author the web site.

DUE DATE

The web site needs to be on-line by the MEMP program public announcement.

4. PROTECTING MISSOURI NATURAL RESOURCES (NEWSLETTER TYPE) ARTICLE

PURPOSE / DESCRIPTION

The purpose is to provide a brief description of MEMP and the process by which applications will be accepted and processed. It will also describe the cooperative programs and recognition and provide contact information.

FORMAT

The format will be a one-page article ready for publication. The same article may be posted on the web site.

AUDIENCE

The audience is PMNR readership.

AUTHOR

The EAO staff will prepare the article.

DUE DATE

The article is due by the time of program announcement.

5. MEMP KICKOFF PRESS RELEASE

PURPOSE / DESCRIPTION

The purpose of the press release is to entice news organizations to do an article on MEMP. The release will include a very brief explanation of MEMP giving a general overview of the process and elements of the program.

FORMAT

The format will be a two-page maximum press release.

AUDIENCE

The press release audience is the standard press release mailing list including newspapers and radio stations.

AUTHOR

The release will be written by the EAO with review by the department communications director and the MEMP Steering Committee.

DUE DATE

The press release will be written and distributed at the time of the program announcement.

MEMP PARTNERSHIP ANNOUNCEMENT PRESS RELEASES

PURPOSE / DESCRIPTION

The purpose is to encourage news organizations to do an article on an individual organization being recognized as a member in the MEMP program. The press release will include a very brief explanation of MEMP with specifics about each particular member.

FORMAT

The press release will include an appropriate quote from department management and perhaps an officer of the MEMP member.

AUDIENCE

The press release will be sent to the standard press release mailing list including newspapers, and radio stations. A copy will also be released to MEMP member for distribution by that organization.

AUTHOR

The appointed EMS gatekeeper for the MEMP member will coordinate the partnership announcement press release.

DUE DATE

The partnership announcement press release will be prepared at the time an organization is admitted to the MEMP program.

6. MISSOURI RESOURCES ARTICLE

PURPOSE / DESCRIPTION

The primary purpose of the article will be to provide a detailed description of MEMP and its initial period of operation. It will also provide information about environmental management systems to the general public and explain the benefits of the MEMP process. It will serve as both an environmental education tool and a resource for potential MEMP applicants. Sidebars could relate an anecdotal experience, quote Missouri business and government leaders, and show environmental success stories. The article could also put MEMP in context with EPA Performance Track and ISO 14000.

FORMAT

The story concept will be submitted in the format acceptable for publication in the *Missouri Resources* magazine and include color photos and sidebars.

AUDIENCE

The audience is the *Missouri Resources* readership.

AUTHOR

EAO staff will write the article with direction from the MEMP steering committee and *Missouri Resources* editors.

DUE DATE

The date of publication of this article will be determined at the time of program initiation.